

IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF TENNESSEE  
COLUMBIA DIVISION

GREGORY D. DOUGLAS, )  
Plaintiff, )  
v. ) NO. 1:18-cv-00015  
DAMON HININGER, et al., ) Judge Campbell  
Defendants. ) Magistrate Judge Frensley

## DEFENDANTS' EXHIBIT LIST

Defendants Brandon Bowers and Doreen Trafton (“Defendants”), by and through counsel, hereby submit to the Court and to the Plaintiff the following information that may be presented at trial, other than solely for impeachment or rebuttal purposes.

## EXHIBITS

Defendants will offer the following exhibits at trial and shall utilize them in accordance with the Federal Rules of Civil Procedure and the Federal Rules of Evidence:

1. Disciplinary Documentation – Incident Number 1235500-161646 (7 pages);
2. Disciplinary Documentation – Incident Number 1235512-161649 (6 pages);
3. Disciplinary Documentation – Incident Number 1235493-161648 (6 pages);
4. Disciplinary Documentation – Incident Number 1235506-161650 (6 pages);
5. Disciplinary Documentation – Incident Number 1235517-161651 (6 pages);
6. Properly-redacted Incident Documentation – 2016-0108-462-II (68 pages);
7. Administrative Policies and Procedures – State of Tennessee Department of Correction – Inmate Grievance Procedures – Index #: 501.01 (11 pages).

Defendants may, if the need arises, offer the following exhibits and as noted above, shall utilize them in accordance with the Federal Rules of Civil Procedure and the Federal Rules of Evidence:

1. Incident Report 5-1A – 2016-0108-121-II (4 pages);
2. Incident Report 5-1A – 2016-0108-422-II (3 pages);
3. Disciplinary Documentation – Incident Number 1231929-161217 (6 pages);
4. Disciplinary Documentation – Incident Number 1211652-158044 (6 pages);
5. Disciplinary Documentation – Incident Number 1216020-159530 (6 pages);
6. Disciplinary Documentation – Incident Number 1219528-159883 (6 pages);
7. Disciplinary Documentation – Incident Number 1223170-160236 (6 pages);
8. Disciplinary Documentation – Incident Number 1226710-160626 (6 pages);
9. Disciplinary Documentation – Incident Number 1231808-161201 (6 pages);
10. Disciplinary Documentation – Incident Number 01201413-156886 (6 pages);
11. Disciplinary Documentation – Incident Number 1203147-157084 (7 pages);
12. Disciplinary Documentation – Incident Number 1205109-157341 (6 pages);
13. Disciplinary Documentation – Incident Number 1205693-157423 (7 pages);
14. Disciplinary Documentation – Incident Number 1205696-157424 (7 pages);
15. Disciplinary Documentation – Incident Number 1205698-157425 (7 pages);
16. Disciplinary Documentation – Incident Number 1208735-157768 (6 pages);
17. Disciplinary Documentation – Incident Number 1199001-156367 (7 pages);
18. Disciplinary Documentation – Incident Number 01199922-156552 (7 pages);
19. Disciplinary Documentation – Incident Number 1200099-156690 (9 pages);
20. Disciplinary Documentation – Incident Number 1200480-156757 (6 pages);

21. Plaintiff's Responses to Defendants' First Set of Interrogatories and Requests for Production Documents;
22. Plaintiff's Medical File - Tennessee Department of Correction;
23. Any certified copies of criminal judgments necessary to establish criminal convictions of Plaintiff and/or any of his witnesses;
24. Any and all pleadings and/or filings filed by the Plaintiff in this matter;
25. Any other exhibits that may be used solely for impeachment or rebuttal purposes.

Respectfully submitted,

PENTECOST, GLENN & MAULDIN, PLLC

By: s/J. Austin Stokes  
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J. Austin Stokes (#31308)  
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**CERTIFICATE OF SERVICE**

This is to certify that I served a copy of this pleading or papers by U.S. mail, first-class, postage prepaid, upon:

Gregory Douglas, #458144  
Northeast Correctional Complex  
5249 Hwy. 67 West  
Mountain City, TN 37683

This the 3<sup>rd</sup> day of January, 2022.

By: s/J. Austin Stokes  
J. Austin Stokes